

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re:

23ANDME HOLDING CO., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-40976

(Jointly Administered)

**STIPULATION EXTENDING THE AUTOMATIC STAY TO  
DEFENDANT LMND MEDICAL GROUP, INC.**

Plaintiffs A.J., H.G., L.V., M.M., and M.I. (collectively, “Class Action Plaintiffs”) and Defendants Lemonaid Health Inc. and LMND Medical Group, Inc., d/b/a Lemonaid Health (collectively, “Class Action Defendants,” and together with Class Action Plaintiffs, the “Class Action Parties”), by and through their respective undersigned counsels of record, hereby stipulate and agree as follows:

WHEREAS, on June 30, 2023, Class Action Plaintiffs commenced a class action lawsuit in the United States District Court for the Northern District of California against the Class Action Defendants<sup>2</sup> alleging damages and injunctive relief arising from the Class Action Defendants’ operation and maintenance of the website <https://www.lemonaidhealth.com> (the “Class Action”). The Class Action remained pending as of the Petition Date.

WHEREAS, on March 23, 2025 (the “Petition Date”), 23andMe Holding Co. and certain of its direct and indirect subsidiaries, including Defendant Lemonaid Health Inc. (collectively, the

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/23andMe>. The Debtors’ service address for purposes of these chapter 11 cases is: 870 Market Street, Room 415, San Francisco, CA, 94102.

<sup>2</sup> Parties to the Class Action (as defined herein) have been modified subsequent to the initial filing of the complaint.

“Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”), in the United States Bankruptcy Court for the Eastern District of Missouri (the “Bankruptcy Court”). The Debtors’ chapter 11 cases are being jointly administered under the lead case *In re 23andMe Holding Co.*, Case No. 25-40976 (collectively, the “Chapter 11 Cases”);

WHEREAS, pursuant to section 362(a) of the Bankruptcy Code, the Debtors’ filing of their respective voluntary petitions gives rise to a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of any judicial, administrative, or other action or proceeding against the Debtors (i) that was or could have been commenced before the commencement of the Chapter 11 Cases or (ii) to recover a claim against the Debtors that arose before the commencement of the Chapter 11 Cases; (b) the enforcement against any of the Debtors or against any property of each of the Debtors’ bankruptcy estates of a judgment obtained prior to the commencement of the Chapter 11 Cases; and (c) any act to obtain possession of property of or from any of the Debtors’ bankruptcy estates, or to exercise control over property of any of the Debtors’ bankruptcy estates.<sup>3</sup> No order has been entered in the Chapter 11 Cases granting relief from the automatic stay;

WHEREAS, on March 26, 2025, Class Action Defendants filed a *Notice of Suggestion of Pendency of Bankruptcy for 23andMe Holding Co., et al., and Automatic Stay of Proceedings* [D.E. #69] in the Class Action providing notice of the Debtors’ commencement of their Chapter 11 Cases and the ensuing stay against, among other things, the continuation of any judicial actions or proceedings against the Debtors, which automatically went into effect as of the Petition Date;

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<sup>3</sup> Nothing herein shall constitute a waiver of the Debtors’ rights to assert any claims, counterclaims, defenses, rights of setoff or recoupment, or any other claims against any party to the above-captioned cases. The Debtors expressly reserve all rights to contest any claims that may be asserted against the Debtors.

WHEREAS, as a result of the commencement of the Chapter 11 Cases, the continuation of the Class Action is automatically stayed as to Defendant Lemonaid Health, Inc.;

WHEREAS, Defendant LMND Medical Group, Inc. is not a debtor in the Chapter 11 Cases and thus, the automatic stay may not apply as to the continuation of the Class Action against such entity;

WHEREAS, counsel for Class Action Plaintiffs and Class Action Defendants have met and conferred and have mutually agreed to extend the automatic stay of the Class Action as to Defendant LMND Medical Group, Inc., subject to the conditions set forth below;

WHEREAS, a stay of this action as to all Class Action Defendants is warranted in order to avoid duplicative and overlapping litigation, waste of judicial resources and the risk of conflicting rulings (to the extent any issues relating to the Class Action are litigated in the Chapter 11 Cases);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between counsel as follows:

1. All proceedings in the Class Action, including against Defendant LMND Medical Group, Inc., should be stayed until the earlier of (a) the Debtors' emergence from the Chapter 11 Cases and (b) the dismissal or conversion of the Debtors' Chapter 11 Cases to a case under chapter 7 of the Bankruptcy Code;
2. For the avoidance of doubt, the stay shall not preclude any party from pursuing information for purposes of prosecuting any matter in the Chapter 11 Cases, including, as applicable, with respect to informal discovery requests served by Class Action Plaintiffs served on Class Action Defendants prior to filing this stipulation; and
3. All Class Action Parties shall implement or continue to maintain appropriate measures to ensure that all documents relevant to the Class Action are preserved in accordance with applicable law.

IT IS SO STIPULATED.

Dated: April 11, 2025

Respectfully submitted,

By: /s/ Matthew J. Langley  
Matthew J. Langley

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